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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TWITTER, INC., a corporation,

Defendant.

Case No. 3:22-cv-3070-TSH

**STIPULATED REQUEST FOR ORDER
EXTENDING BRIEFING DEADLINES
ON X CORP.'S MOTION FOR
PROTECTIVE ORDER & RELIEF
FROM CONSENT ORDER**

1 Pursuant to Local Rules 6-1 and 6-2, the parties stipulate and respectfully request that the Court
2 enter the attached proposed order extending the briefing deadlines related to X. Corp.'s Motion for
3 Protective Order & Relief from Consent Order, ECF No. 17.

4 On May 25, 2022, Plaintiff the United States of America filed the Complaint in this action, which
5 alleged that Defendant Twitter, Inc. had violated a 2011 Federal Trade Commission ("FTC")
6 administrative order and the FTC Act by misrepresenting the extent to which Twitter maintained and
7 protected the privacy of nonpublic consumer information. ECF No. 1. On May 26, 2022, this Court entered
8 a Stipulated Order for Civil Penalty, Monetary Judgment, and Injunctive Relief ("Stipulated Order") to
9 resolve the claims for civil penalties and injunctive relief set forth in the Complaint. ECF No. 11.

10 On July 13, 2023, X Corp., successor in interest to Defendant Twitter, Inc. ("X Corp."), filed a
11 motion to terminate, modify, or stay enforcement of the Stipulated Order, and for a protective order staying
12 the Notice of Deposition of Elon Musk issued by the FTC. *See* ECF No. 17 ("X Corp.'s Motion"). The
13 United States Department of Justice did not have an opportunity to meet and confer with counsel for X.
14 Corp. prior to the filing of the X. Corp.'s Motion. Under Local Rule 7-3, the United States' opposition to
15 that motion is due by July 27, 2023, and X Corp.'s reply is due by August 3, 2023.

16 The parties have since conferred regarding these deadlines and agree that additional time would
17 be appropriate to enable thorough briefing of the issues raised by X Corp.'s motion. *See* Decl. of Zachary
18 L. Cowan, attached. Pursuant to that agreement, the parties stipulate and jointly request that: (1) the United
19 States' deadline to file an opposition to X Corp.'s motion be extended to September 11, 2023 (60 days
20 from X Corp.'s motion); (2) X Corp.'s deadline to file a reply be extended to October 11, 2023 (30 days
21 from the opposition); and (3) the Court hear X. Corp.'s Motion at a time that is convenient for the Court
22 thereafter. Counsel for the FTC have agreed that the FTC will await the Court's decision on X Corp.'s
23 motion before taking Mr. Musk's deposition or taking further administrative action under the Stipulated
24 Order or the FTC administrative order.

25 The parties have not previously requested any time modifications in this case, and no case schedule
26 in this matter will be affected by the time modifications requested here.

Dated: July 19, 2023

Respectfully submitted,

FOR DEFENDANTS:

FOR THE UNITED STATES OF AMERICA:

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FILER ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I hereby attest that the other listed signatory on whose behalf this filing is submitted concurs in the filing's content and has authorized the filing.

/s/ Zachary L. Cowan
Zachary L. Cowan